

Application No. 09/609,269  
Amendment "A" dated June 11, 2004  
Reply to Office Action mailed March 11, 2004

### REMARKS

The first Office Action, mailed March 11, 2004, considered claims 1-41. Claims 1-4, 11-24, 31-36 and 41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Bowker (EP 0872990 A1), while claims 5-10, 25-30 and 37-40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bowker<sup>1</sup>.

Claims 1-41 are currently pending in this application, of which claims 1, 13, 20, 33 and 35 are the five independent claims at issue. Each of these independent claims has been amended by this paper. Support for the claim amendments is found in the disclosure of the pending application (see p. 5, ll. 21-23; p. 6, ll. 8-10; p. 10, ll. 6-9; p. 22, ll. 18-20; p. 25, ln. 21- p. 26, ln. 1; and Fig. 7A). Dependent claim 21 has also been amended to provide consistent terminology with the amended language recited in claim 20.

The first claimed embodiment, recited in method claim 1 and the corresponding computer program product claim 13 each include elements for converting a data structure from a first format into a second format. The recited elements, as amended, include: (a) identifying a sequence of format conversion modules that, when executed in sequence, converts the data structure from the first data format into the second data format; (b) converting the data structure from the first data format into an intermediate data format using a first format conversion module in the sequence of data conversion modules; and (c) converting the data structure from the intermediate data format into the second data format using at least two second format conversion modules in the sequence of data conversion modules, each of the second format conversion modules converting the data structure into different formats.

The remaining independent claims are directed to methods (claim 20), computer program products (claim 33) and systems (claim 35) for converting a data structure from a first format to a second format through the identification of a plurality of sequences of format conversion modules that each, when executed in sequence, converts the data structure from the first data format into the second data format.

<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.


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Bowker, in contrast, discloses a method and system for converting data from a first format to a preferred format after first transcoding the data into a single common format. (Col. 3, ll. 23-26). "Alternatively, the [Bowker system] may in appropriate circumstances transcode data directly into the user's preferred format." (Col. 3, ll. 26-28). Bowker also discloses one embodiment in which the data can be transcoded into an alternative format "which while not preferred is still understandable or compatible." (Col. 3, ll. 28-31). Bowker fails, however, to disclose or suggest any embodiment in which a plurality of different format conversion sequences are utilized to convert the data from a first format to a second format (Claims 20, 33, 35), or in which a plurality of different format conversion modules are utilized to convert data from an intermediary format to the second format (Claims 1, 13), as claimed.

For at least these reasons, Applicants respectfully submit that the pending claims 1-41 are distinguished from the art of record and are now in condition for prompt allowance. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 11 day of June 2004.

Respectfully submitted,



RICK D. NYDEGGER  
Registration No. 28,651  
JENS C. JENKINS  
Registration No. 44,803  
Attorneys for Applicant

Customer No. 022913

RDN:JCJ:cm  
CM000003570V001